

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

Ocean Semiconductor LLC,

Plaintiff

v.

MediaTek Inc. and MediaTek USA Inc.  
("MediaTek"),

Defendants.

Civil Action No.: 6:20-cv-1210-ADA

JURY TRIAL DEMANDED

PATENT CASE

Ocean Semiconductor LLC,

Plaintiff

v.

NVIDIA Corporation,

Defendant.

Civil Action No.: 6:20-cv-01211-ADA

JURY TRIAL DEMANDED

PATENT CASE

Ocean Semiconductor LLC,

Plaintiff

v.

NXP USA, Inc.

Defendants.

Civil Action No.: 6:20-cv-1212-ADA

JURY TRIAL DEMANDED

PATENT CASE

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Ocean Semiconductor LLC,  
Plaintiff

v.

Renesas Electronics Corporation and Renesas  
Electronics America, Inc.,  
Defendants.

Civil Action No.: 6:20-cv-1213-ADA

JURY TRIAL DEMANDED

PATENT CASE

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Ocean Semiconductor LLC,  
Plaintiff

v.

Silicon Laboratories Inc.,  
Defendant.

Civil Action No.: 6:20-cv-1214-ADA

JURY TRIAL DEMANDED

PATENT CASE

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Ocean Semiconductor LLC,  
Plaintiff

v.

STMicroelectronics, Inc.,  
Defendant.

Civil Action No.: 6:20-cv-1215-ADA

JURY TRIAL DEMANDED

PATENT CASE

Ocean Semiconductor LLC,

Plaintiff

v.

Western Digital Technologies, Inc.

Defendant.

Civil Action No.: 6:20-cv-1216-ADA

JURY TRIAL DEMANDED

PATENT CASE

**DECLARATION OF ALEX CHAN IN SUPPORT OF PLAINTIFF OCEAN SEMICONDUCTOR LLC'S RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Alex Chan, Esq., declare as follows:

1. I am a partner at the Devlin Law Firm LLC. I am currently in good standing and licensed to practice in the State of Texas and a member of the bar of this Court.

2. I am counsel of record for Plaintiff Ocean Semiconductor LLC, ("Ocean") in this action, and make this Declaration in support of Ocean's contemporaneously-filed Responsive Claim Construction Brief.

3. The facts set forth herein are true to my personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

4. Attached as Exhibit A to this Declaration is a true and correct copy of excerpts of the transcript, in rough draft and uncertified form, recorded during the deposition of Dr. Costas J. Spanos on October 20, 2021. An uncertified version is submitted at this time because, as of the filing of this declaration, a certified version is not yet available from the reporting service.

5. Attached as Exhibit B to this Declaration is a true and correct copy of Defendants' Disclosure of Preliminary Proposed Constructions, dated September 15, 2021.

6. Attached as Exhibit C to this Declaration is a true and correct copy of STMicroelectronics, Inc.'s Petition For *Inter Partes* Review of U.S. Patent No. 6,420,097, dated August 20, 2021.

7. Attached as Exhibit D to this Declaration is a true and correct copy of Exhibit A-02 of Defendants' Invalidity Contentions: Comparison of U.S. Patent No. 6,660,651 and Japanese Unexamined Patent App. Pub. No. JP H11-274031 (Wakui). While this document is undated, it was served as an attachment to Defendants' Preliminary Invalidity Contentions dated August 27, 2021.

I declare under penalty of perjury under the laws of the United States that to the best of my knowledge and recollection the foregoing is true and correct.

Executed this 25th day of October, 2021.

/s/ Alex Chan  
Alex Chan